

## **AFFIDAVIT OF ROBERT DOUCETTE**

Robert G. Doucette, having been duly sworn, subject to the penalty of perjury, deposes and states:

1. My name is Robert G. Doucette. I am employed by Alaska Communications Services at its offices at 600 Telephone Avenue, Anchorage Alaska, 99503. Alaska Communications Services is a subsidiary of Alaska Communications Systems, Inc. and an affiliate of ACS-Long Distance, Inc. In my position as Director, Corporate Strategy, I am responsible for analysis and planning of long-term strategies.
2. I have reviewed Alascom's direct case, filed in this docket on September 17, 2004, and the accompanying computer disk that contains data supporting the filing, subject to a Protective Order.
3. In the course of my review, I encountered numerous difficulties in evaluating Alascom's responses to the questions that the Commission posed in its Order Designating Issues For Investigation, dated July 30, 2004. For example, I found that Alascom had made mistakes in labeling and citing to documents, including to its CAP Workbook. Also, I found that some of the workbooks were not linked. In those cases, I had to manually transfer numbers so calculations would flow through the model. Since I had to make these changes by hand, unavoidably, I injected the possibility of human error into the process.
4. Additionally, I could not conclusively track how Alascom's costs and rates flowed from one year to the next because Alascom did not present data for successive tariff revision years under consideration.

5. I observed certain trends over the years that I questioned, however. For example, I observed a shift of plant investment toward the Bush locations, while the majority of traffic over this time remained non-Bush.
6. I was concerned about these anomalies, and questioned whether Alascom's Bush rates were excessive because they recovered a disproportionate share of plant costs.
7. I believe that the Bureau's audit of Alascom's line items presented in the CAP model will be critical to verifying whether Alascom has accurately and consistently collected the underlying data. Alascom states generally that its cost and demand data comes from its "financial systems." However, the FCC has never audited these systems before, since the tariff revisions have been suspended, but not investigated, since 1995.

The foregoing is true and correct to the best of my knowledge and belief.

October 13, 2004



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Robert G. Doucette